

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

Kristin Neeser,

Plaintiff,

vs.

MAC Acquisition LLC, and Sullivan's
Holding LLC d/b/a Sullivan's Steakhouse,

Defendants.

Civil Action No. 3:20-cv-00389-FDW-DCK

**CONSENT MOTION FOR EXTENSION
OF TIME TO ANSWER OR
OTHERWISE PLEAD IN RESPONSE
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT**

Defendants, MAC Acquisition LLC and Sullivan's Holding LLC, (Defendants), through their undersigned counsel and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1, respectfully move the Court for an extension of time, up to and including October 6, 2020, to file their Answer or otherwise plead in response to Plaintiff's First Amended Complaint. In support of this Motion, Defendants show the following:

1. On September 15, 2020, Plaintiff Kristin Neeser (Plaintiff) filed her First Amended Complaint (Amended Complaint). As such, Defendants' response to Plaintiff's Amended Complaint is currently due September 29, 2020.
2. Defendants need additional time to prepare an appropriate response to the Amended Complaint due to defense counsel needing to prepare briefs for multiple motions in a single case since the filing of the Amended Complaint in this matter, in addition to attending to the rest of defense counsel's docket. Accordingly, Defendants respectfully request that this Court extend their time for filing a response to Plaintiff's Amended Complaint, up to and including October 6, 2020.
3. Defense counsel conferred with Plaintiff's counsel, who consented to the requested extension.
4. This Motion is made in good faith and not for the purposes of undue delay.

5. A proposed Order granting the requested extension of time is submitted herewith.

WHEREFORE, for the above reasons, Defendants respectfully move this Court to extend the time in which they may respond to the Amended Complaint, through and including October 6, 2020.

Respectfully submitted, this 28th day of September, 2020.

/s/Steven Andrew Nigh

Steven Andrew Nigh, Bar No. 51837

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Attorneys for Defendants

MAC Acquisition LLC and Sullivan's Holding

LLC

C CERTIFICATE OF SERVICE

This is to certify that on September 28, 2020, the undersigned filed the foregoing using the Court's CM/ECF, which will automatically send notification of such filing to the following counsel of record:

Gilda A. Hernandez (NCSB No. 36812)
Charlotte Smith (NCSB No. 53616)
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